282. Moreover, even accepting BellSouth's unsupported assumption of three pre-ordering transactions per order, LENS' stated capacity would be 30,000 pre-ordering transactions per day, or about 3,300 per state in the BellSouth region from all CLECs. BellSouth has presented no evidence that the number of such transactions will be so limited. To the contrary, given that AT&T alone has forecast 3,000 orders per day and 3,000 pre-ordering inquiries per hour, the stated capacity of LENS appears inadequate even under BellSouth's inflated projections.[176]

283. Further, in addition to the aggregate pre-ordering capacity of LENS, BellSouth has presented no reliable evidence regarding LENS' ability to handle simultaneous users. The sole evidence offered by BellSouth in this regard is the "testing data" presented in Mr. Stacy's affidavit, which states that BellSouth internally tested LENS to support 160 simultaneous users. See Stacy OSS Aff., Exh. WNS-45, p. 4. After the Department of Justice stated in the South Carolina § 271 proceeding that this capacity "appears to be woefully inadequate" for existing or foreseeable demand in the entire BellSouth region, Mr. Stacy announced in his reply affidavit ten days later that "LENS is now capable of handling 300 simultaneous users," with a "readily available" capacity of 1500 such users, "if needed."[177] Like his original figure, Mr. Stacy's newly-announced capacity data are unsupported by any evidence.

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[176] Id.

[177] DOJ South Carolina Evaluation, p. A-28; Stacy S.C. Reply Aff., ¶ 62.

Moreover, even his claimed capacity amounts to fewer than 35 users per state in the BellSouth region -- an amount that is insufficient in a highly competitive environment.

284. BellSouth has also not demonstrated that LENS can meet its pre-ordering capacity claims while simultaneously processing orders, at capacity or below. In fact, contrary to Mr. Stacy's assertions, recent experience suggests that BellSouth's pre-ordering interfaces do not have sufficient capacity to handle a large number of CLEC orders or a large number of simultaneous users. During the past few months, access to both RSAG and LENS has become unavailable when substantial numbers of AT&T representatives used these systems, even though they fell well within the capacity of these systems as stated by BellSouth.

1. Denial of RSAG Access

285. Access to RSAG, which is the legacy system that BellSouth offers for obtaining access to street address information, is critical, because an order will not be processed without a proper street address. In July 1996, BellSouth asserted that its interim RSAG interface (ICREF) could support 200 simultaneous users and over 700 transactions per hour.[178] However, AT&T's market entry effort in Georgia demonstrated that this claim was unfounded.

286. During the week ending August 9, 1997, AT&T commenced the introduction of its local exchange service into the Georgia residential local exchange market.

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[178] At the time, pursuant to the provisions of the Interconnection Agreement regarding interim pre-ordering interfaces, BellSouth provided AT&T with access to RSAG through a Local Area Network to Local Area Network connection so that AT&T could perform the pre-ordering function of address validation. See Interconnection Agreement, Att. 15, § 4.5.

More than 100 AT&T customer service representatives were used in this effort.

287. As a result of AT&T's marketing efforts during the week ending August 9, the number of service orders submitted to BellSouth increased dramatically from the previous week, when AT&T was still in the Market Readiness Testing stage. During the week ending August 2, AT&T submitted 336 orders to BellSouth; during the week ending August 9, 979 orders were submitted. At any given time during the latter week, due to the increased order volumes, numerous AT&T representatives sought access to BellSouth's systems.

288. Beginning on August 6, 1997, AT&T's access to RSAG ranged from extremely limited access to no access whatsoever; the latter situation occurred whenever AT&T had more than 20 representatives seeking access to BellSouth's systems simultaneously, despite BellSouth's prior claim that the interim RSAG interface can support 200 simultaneous users and over 700 transactions per hour. Because of the problems with access, for the first couple of nights when RSAG could not be accessed, AT&T could take no orders, and its representatives were sent home. Thereafter, as RSAG continued to be inaccessible, AT&T representatives were required to take orders on paper for later entry, which delayed the submission of orders to BellSouth.

289. AT&T's substantial loss of access to RSAG lasted from August 6 to August 13. BellSouth's performance improved only after AT&T escalated the issue to the BellSouth executive level, and after AT&T complained to the Louisiana PSC (on August 13). Even after August 13, however, significant problems were encountered in obtaining access to RSAG. On

August 18, 22, 27, and 28, AT&T experienced additional access problems, one of which lasted nearly two hours (and had not been resolved when the work shift ended), affecting as many as 60 sales representatives at a time. A chronology of the RSAG access problems, including the duration of the lack of access and the sales representatives affected, is set forth in Attachment 53 hereto.

290. The RSAG access problems that occurred between August 6 and September 3 significantly impaired AT&T's marketing efforts. The unavailability of RSAG resulted in a huge backlog of orders awaiting later entry. Hundreds of orders accumulated, due dates quoted to customers were not met, and AT&T's costs increased. Ultimately, and in significant part due to the backlog, AT&T was compelled to reduce its telemarketing efforts to 100 orders per day -- in comparison to the thousands of orders that it had taken per week. Even with these restrictions, the backlog caused by the RSAG problem took AT&T weeks to clear.[179]

291. In its Ameritech Michigan Order, the Commission found that a BOC "should be able to handle, without receiving advance notice from competing carriers, volumes of orders that fall within its stated capacity." Ameritech Michigan Order, ¶ 198. There, the inability

[179] Because the backlog delayed submission of orders to BellSouth, the number of orders actually submitted to BellSouth increased during the last weeks of August, reaching weekly levels of 1,585 orders and 2,737 orders (the highest weekly volumes to date) during the weeks ending August 23 and August 30, respectively. In early September, when AT&T imposed limits on its telemarketing efforts, the weekly volumes submitted to BellSouth then began to decline; 1,870 orders were submitted during the week ending September 6, 1,173 orders during the week ending September 13, and 992 orders during the week ending September 20.

of Ameritech to handle adequately an increase in order volume "indicate[d] that Ameritech has not demonstrated that its systems are capable of handling the order volumes and fluctuations reasonably expected in a competitive marketplace." Id., ¶ 199. The same is true with respect to access to BellSouth's RSAG. Access to RSAG was denied or impeded, and submission of orders thereby delayed, when AT&T's weekly order volumes did not even exceed 1,000 -- or approximately two percent of the capacity that Mr. Stacy attributes to BellSouth's systems. Although that weekly level represented an increase of approximately 200 percent from the period preceding market entry, it was not even one-third of the daily volumes that AT&T expects to submit to BellSouth when it is able to make full-scale market entry. Furthermore, access to the RSAG system failed when it was being accessed simultaneously by only 20 AT&T representatives -- or one-tenth of the capacity alleged by BellSouth.

292. Mr. Stacy contends that the problems that AT&T experienced with RSAG "did not occur with any of the interfaces on which BellSouth is relying for nondiscriminatory access," but rather related to the ICREF interim pre-ordering interface.[180] See Stacy S.C. Reply Aff., ¶ 45. Mr. Stacy further contends that the problems occurred because "multiple AT&T agents were improperly using the same passwords to access the system," and that "AT&T had

[180] Mr. Stacy's assertion that AT&T's representatives were using ICREF "because they had not yet completed their internal training program on LENS" is misleading. Stacy S.C. Reply Aff., ¶ 45. As Mr. Stacy is well aware, AT&T's representatives did not receive passwords needed to access LENS until approximately the third week of August, and they therefore had no choice but to use ICREF in early August.

failed to request from BellSouth an appropriate number of passwords." Id. Mr. Stacy's account is seriously misleading and inaccurate.

293. In approximately September or October, 1996, AT&T had requested individual password identifications from BellSouth that would allow each of its more than 700 representatives to access RSAG using ICREF. BellSouth, citing the interim nature of the interface, was reluctant to issue and administer individual passwords for AT&T's representatives. Instead, BellSouth issued a few passwords for each AT&T work center and directed AT&T representatives to share those passwords. BellSouth also was fully aware of AT&T's volume forecasts -- which obviously contemplated that more than a few AT&T representatives would be accessing RSAG to place orders. Thus, what BellSouth characterizes as AT&T's "improper" action occurred at the direction of, and with the knowledge of, BellSouth.

294. Mr. Stacy claims that AT&T improperly depicted the RSAG problems as "a 'capacity' problem." Id. But according to Mr. Stacy, "[w]hen the actual number of users became known, BellSouth immediately, and proactively, doubled the physical capacity of the interface to accommodate the volume. BellSouth also revised the system parameters to reflect the actual numbers of AT&T agents using the system." Id., ¶ 46 (emphasis added). Mr. Stacy provides no explanation why BellSouth took these actions, if the problems merely involved passwords and not system capacity. To the contrary, Mr. Stacy's explanation of the steps taken by BellSouth appears to confirm that the problems related to capacity, and that fixes were implemented by BellSouth to increase its capacity.

295. Mr. Stacy also claims that "AT&T did not follow the established, agreed-upon problem reporting process" and that AT&T "erroneously interpreted and reported" the error messages that it received as "RSAG problems." Id. However, AT&T reported the problems it was experiencing to BellSouth via the 800 trouble reporting number BellSouth had provided to AT&T. Nor do I believe that AT&T "erroneously interpreted" the error messages, which stated "RSAG unavailable."[181]

296. BellSouth applied its fixes to the RSAG access problem at various times from August 6 through September 3, 1997. It was not until mid-September that BellSouth indicated it was ready to accept the previously forecasted volume usage of ICREF interface. By this time, however, AT&T had converted to LENS and was using it to access RSAG. Accordingly, AT&T had no need at that time to use ICREF, other than in a backup capacity.

2. Problems With LENS Access

297. AT&T's recent experiences with LENS also raise serious questions concerning the adequacy of LENS' pre-ordering capacity. On September 19, 1997, when approximately 60 AT&T representatives were using LENS to perform a series of address validations and telephone number transactions, more than half of the representatives experienced many "time-out" errors. When AT&T contacted BellSouth's Help Desk, no one was available.

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[181] Contrary to Mr. Stacy's assertion, the hours of operation for BellSouth's systems are not "the same for CLECs and for BellSouth." Stacy OSS Aff., ¶ 109. LENS has a "downtime" period on Friday evenings (8 p.m. to midnight) that is over and above that for BellSouth's RNS, DOE, and SONGS systems.

When a Help Desk agent returned AT&T's call, she stated that BellSouth had experienced problems with the software that connects LENS with RSAG.

298. Beginning the week of September 22, 1997, AT&T experienced daily problems with LENS. The BellSouth database that validates user identifications frequently malfunctioned, denying numerous AT&T representatives access to LENS, even though the representatives were placing transactions for no more than 100 orders a day into LENS. Although AT&T immediately notified BellSouth when the problem first occurred, the problem lasted for three days -- and continues to reoccur sporadically.

299. In addition, on September 22 BellSouth asked AT&T to consider "spreading" its LENS users over several LENS servers, rather than sending all of AT&T's traffic to one server. BellSouth explained that it was concerned that AT&T's orders might overload the LENS server that was handling the orders, and that splitting the traffic among several servers would provide more assurance that AT&T would not experience access problems in the future.

300. Although BellSouth ultimately promised to take corrective action on its side of the gateway, and withdrew its request for AT&T to "spread" traffic, AT&T has not been advised by BellSouth that the changes have yet been made. More importantly, the incident raises serious questions about the pre-ordering capacity of LENS. The claimed capacity of the LENS server used by AT&T is 2,000 orders per day (and, apparently, 30,000 pre-ordering transactions per day), but the average daily volume of transactions submitted by AT&T has not yet approached that level. During the first three weeks of September -- the month when BellSouth

requested this change -- AT&T's total weekly volumes submitted to BellSouth never exceeded 1,870 orders (which equates to between approximately 5,600 and 15,000 pre-ordering transactions). If LENS has adequate capacity, as Mr. Stacy contends, there is no reason why BellSouth would have raised the suggestion of "splitting" traffic in the first place. Moreover, if BellSouth feels compelled to take corrective action in the face of relatively small volumes of traffic at this stage to avoid access problems on LENS, LENS will likely have even greater capacity problems as larger volumes of orders are submitted in the future.

301. The aforementioned claim of Mr. Stacy that LENS is now capable of handling 300 simultaneous users, with a "readily available" capacity of 1,500 users (Stacy S.C. Reply Aff., ¶ 62), is certainly not consistent with AT&T's experience with LENS. In August and September, the problems I have described occurred when only approximately 60 AT&T representatives were using LENS. BellSouth's systems have not demonstrated that they have sufficient capacity to meet the pre-ordering needs of CLECs.

C. Ordering/Provisioning Interfaces

302. Mr. Stacy does not even describe the capacity of BellSouth's EXACT interface, which purportedly supports the ordering of certain UNEs.[182] BellSouth also has not

[182] According to Mr. Stacy, capacity testing of the interfaces other than LENS and EDI "is not needed because they have been tested through actual operations." Stacy OSS Aff., ¶ 119. However, the fact that an interface such as EXACT is currently used by BellSouth to process access requests from interexchange carriers does not mean that EXACT has sufficient capacity to handle orders from CLECs for UNEs. The number of local service customers of CLECs is likely to be many times greater than the number of interexchange carriers currently served by BellSouth.

shown that its two remaining ordering interfaces, EDI and LENS, have sufficient capacity to process the expected volumes of CLEC orders.

303. At the end of September, Mr. Stacy asserted that, "[b]ased on volume testing, the capacity of BellSouth's EDI and LENS ordering systems . . . has been verified as being at least 5,000 local service requests per day, which is the forecasted capacity for which these systems initially were designed." Stacy S.C. OSS Aff., ¶ 119. AT&T pointed out a number of serious flaws in Mr. Stacy's analysis, including:

- Mr. Stacy failed to provide any basis or supporting documentation for BellSouth's forecasts, including the specific forecasts that BellSouth allegedly received from CLECs. See id., Aff., ¶ 120 & Exh. WNS-44.

- Mr. Stacy based his capacity analysis on what he described as BellSouth's "forecast information" for 1997. Id., ¶¶ 120, 125. This assumption was unreasonable. A number of CLECs, including AT&T, are seeking to compete aggressively in the BellSouth region, which consists of more than 15,000,000 residential access lines and 6,700,000 business access lines.[183] Given the substantial turnover expected in the local exchange market as a result of competition, it is illogical to assume that only 5,000 orders would be submitted on a daily basis by all of the CLECs in the entire nine-state BellSouth region.

It will therefore be important to test the capacity of the EXACT interface to process successfully and promptly the increased volume of orders for local exchange service.

[183] According to BellSouth's Form 10-K filed with the Securities and Exchange Commission, as of December 31, 1996, BellSouth had a total of 22,135,000 access lines in service, of which 15,136,000 were residential and 6,732,000 were business. See BellSouth Form 10-K For the Fiscal Year Ended December 31, 1996 (February 1997), p. 16. As of the end of the second quarter of 1997, BellSouth served a total of 22,717,000 residential and business access lines. See "BellSouth Reports Strong Second Quarter Earnings," BellSouth news release dated July 21, 1997.

- Mr. Stacy's analysis also assumed that LENS and the EDI interface can be used interchangeably by any carrier. In fact, large-scale carriers such as AT&T will use only the EDI interface, given the numerous deficiencies in LENS.[184] The EDI interface's stated capacity of 4,000 orders per day was plainly insufficient to support all of these carriers, since AT&T alone expected to submit 3,000 orders per day via the EDI interface.

See Bradbury S.C. Aff., ¶¶ 263-67.

304. Rather than addressing these deficiencies, Mr. Stacy merely inflated the 5,000 order capacity figure in his previous affidavit to a capacity estimate of 10,000 orders per day. See Stacy OSS Aff., ¶ 120. Mr. Stacy does not contend that BellSouth doubled its capacity by modifying its systems in any way. Instead, Mr. Stacy has merely altered his assumption from a 10-hour production day to a 20-hour day. Compare Stacy S.C. OSS Aff. Exh. WNS-43 (assuming 10-hour day) with Stacy Louisiana OSS Aff. Exh. WNS-43 (assuming 20-hour production day). Mr. Stacy's doubling of his capacity estimate in the absence of any actual systems improvements is completely unsupported, and further calls into question the validity of all of his capacity estimates.

305. More fundamentally, Mr. Stacy's inflated 10,000 order capacity claim fails to take into account the reality that CLEC demand is not spread evenly throughout a 20-hour day, but can fluctuate significantly during the day. Particularly as more CLECs enter the market, the

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[184] See ¶ 101, supra and Attachment 19 hereto, pp. 1-2; Deposition of William N. Stacy in Docket No. 960786-TL (Fla. PSC), August 14, 1997, pp. 55-56 (Attachment 13 hereto).

order processing flow is likely to be unpredictable and fluctuating.[185] Because BellSouth has made no actual systems enhancements to increase its capacity, however, its maximum hourly order processing capacity is still the same -- 500 orders.[186] Thus, notwithstanding Mr. Stacy's claim that BellSouth's capacity is now 10,000 orders daily, BellSouth will exceed its capacity whenever order volumes rise above 500 orders per hour.

306. Mr. Stacy's assertion that BellSouth could "readily increase" its capacity with "hot spare" arrangements to 20,000 orders per day is unpersuasive. Id., ¶ 122. Mr. Stacy provides no evidence to support this position, and it is inconsistent with BellSouth's submission to the Department of Justice on October 20, which estimated that it would need 90 days to double the capacity of its ordering interfaces. See Stacy Aff., Exh. WNS-52, p. 116, Table 6-2. It is cold comfort to competing carriers that, if their orders are backlogged due to insufficient interface capacity, BellSouth can "readily increase" capacity in 90 days.

307. In addition to the lack of evidence that its interfaces have sufficient capacity to process orders electronically, Mr. Stacy provides no source or basis for his demand forecasts, which now have increased to approximately 643,000 resale orders and 349,000 UNE orders. Given the questions that already have been raised about BellSouth's 1997 resale order forecasts (which, inexplicably, forecast no volumes at all prior to June 1997, even though BellSouth

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[185] See Ameritech Michigan Order, ¶ 195 & n.502.

[186] 500 orders per hour results in Mr. Stacy's 5,000 daily capacity figure (assuming a 10-hour production day) and 10,000 daily capacity estimate (assuming a 20-hour day).

represented in discovery that it had received 130,000 resale orders through July), BellSouth's 1998 forecasts also appear questionable. Id., Exh. WNS-44, p. 2.

308. BellSouth further has not shown that, to the extent orders must be processed manually by BellSouth, BellSouth has devoted the personnel and resources to handle those orders in a timely, accurate, and reliable manner. Using the analysis prepared by BellSouth's outside consultant in its analysis of the LCSC, Mr. Stacy states that the LCSC is handling 1,625 local service requests per day, with a total processing capacity of 3,325 requests per day.[187] However, that volume is far lower than the claimed combined capacity of its electronic interfaces.

309. More significantly, BellSouth is receiving most of its orders manually. Based on BellSouth's discovery responses, the LCSC received and processed more than 100,000 resale orders manually between January 1 and July 31, 1997. Although that volume is within the capacity stated by Mr. Stacy, future volumes are likely to be vastly greater, unless the CLECs currently submitting orders by facsimile utilize electronic interfaces. Consequently, it cannot be assumed that the LCSC's current capacity can handle future volumes. The "contingency plans" cited by Mr. Stacy are little more than promises to take action in the future -- which are irrelevant to the issue of a BOC's current compliance with its obligations. Id., ¶ 122.

D. The Maintenance and Repair Interfaces

310. BellSouth's repair interfaces, TAFI and T1M1 EBI, also lack sufficient

[187] Stacy OSS Aff., ¶ 134 & Exh. WNS-47; DeWolff August 15 report, p. 8 & attached Capacity/Capability Chart (Attachment 44 hereto).

capacity to handle effectively and efficiently the combined operational requirements of all new entrants. In fact, BellSouth does not even discuss the capacity of T1M1 EBI, which AT&T would prefer to use and is the only repair interface that can be used to order repair and maintenance of certain UNEs.[188] Although Mr. Stacy claims that the capacity of TAFI is adequate, the facts do not support his assertion.

311. Mr. Stacy claims that TAFI currently has the capacity to support 130 simultaneous users, and 2,600 troubles per hour, throughout BellSouth's nine-state region. In addition, he states that this capacity can be increased "almost immediately" to a total of 195 users, or 3,900 troubles per hour. Stacy OSS Aff., ¶ 128. The combined operational requirements for new entrants, however, may be much higher. Each new entrant needs to be able to have all of its repair attendants logged onto TAFI simultaneously, in order to provide timely service to their customers. Otherwise, a new entrant's repair attendant will have to log onto TAFI every time he receives a trouble report for a customer in BellSouth territory. New entrants, particularly larger national carriers, have large numbers of repair attendants who will need to be logged onto TAFI. Because of TAFI's inadequate capacity, new entrants will have to have at least some of their repair attendants log onto TAFI each time they receive a trouble report from a customer. The time consumed in logging onto TAFI, and the distinct possibility that there will be no open "slots"

[188] Contrary to Mr. Stacy's assertion (Stacy OSS Aff., ¶ 119), the fact that EBI is currently used by interexchange carriers for access services does not mean that its capacity (like the capacity of EXACT) can be assumed to be adequate to handle the expected volumes of CLEC orders. See fn. 182, supra.

when the representative attempts to log on, will prevent the provision of timely service.[189]

312. By contrast, BellSouth's systems are not subject to these user limitations, because -- as Mr. Stacy admits -- BellSouth maintains a separate TAFI system for its own retail operations. Id., ¶¶ 89-90. This difference is clearly discriminatory.

E. The Billing Interfaces

313. BellSouth has offered no evidence to support Mr. Stacy's statement that its CLEC daily billable usage system has sufficient capacity to process daily usage files for CLECs. Id., ¶¶ 131, 133. The only basis that Mr. Stacy offers for his position is the fact that BellSouth "has not identified any constraints to its capacity to process daily usage files for CLECs," and that its systems have "spare capacity." Id., ¶ 132. BellSouth's ability to process current volumes, however, is no indication of its ability to handle the far greater volumes that can be expected in the future. Since BellSouth provides CLECs with only a portion of the usage data that it records and should be providing (¶ 252, supra), Mr. Stacy understates the load that must be accommodated.

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[189] Although Mr. Stacy contends that BellSouth has conducted tests to ensure that TAFI can handle commercial volumes, he provides no details, results, or description of those tests. Stacy OSS Aff., ¶¶ 127, 129. In any event, the volumes involved were only a fraction of TAFI's alleged capacity, and therefore provide no indication of the volumes that TAFI can actually handle. Id. The ability of TAFI to handle current volumes (which are low, due to the barriers to entry erected by BellSouth) is no indication of the current ability of TAFI to handle reasonably foreseeable demand volumes. See Ameritech Michigan Order, ¶ 138.

F. BellSouth's Claims of Capacity Testing

314. Mr. Stacy's various claims that BellSouth has performed the necessary capacity testing on its various interfaces is belied by his own testimony and exhibits. See Stacy OSS Aff., ¶¶ 119-124, 127. For example, Mr. Stacy acknowledged at the end of September that BellSouth still had not completed stress testing of its systems. See Stacy S.C. OSS Aff., ¶ 118 (stating that IBM is to "return when stress testing is completed to review results of a multi-day demo of the CLEC interface systems under load conditions. The review is expected to be completed by November, 1997") (emphasis added). In his Louisiana affidavit, Mr. Stacy now states that IBM's review of the load demonstration results "is expected to be completed by mid-December, 1997." Stacy OSS Aff., ¶ 119. Mr. Stacy offers no information as to whether BellSouth has even now finished stress testing of its systems, and he acknowledges that the IBM review will not be concluded for many weeks. Id. These facts demonstrate that BellSouth has not yet completed its capacity testing.

315. Furthermore, the only "evidence" of testing that Mr. Stacy provides in support of his claim of capacity testing is a four-page series of bar graphs that summarize the results of tests (apparently internal) conducted by BellSouth. Id., ¶ 124 & Exh. WNS-45. The charts are unaccompanied by any underlying data or documents, or even by a description of the methodology that was used (other than Mr. Stacy's assertion that the BellSouth testing plan incorporated the recommendations of IBM). See id. At best, they show that some kind of volume testing was performed on a few selected days. Id. This is plainly insufficient to support

BellSouth's claim of sufficient capacity.

VI. CONCLUSION

316. In light of the operational and capacity limitations of its current interfaces, BellSouth's claim that it has already met its checklist obligations with respect to OSS is unfounded. Despite AT&T's repeated requests and persistent efforts, BellSouth does not have in place electronic interfaces that are providing, or could provide, CLECs with nondiscriminatory access. BellSouth has not even provided interface specifications that would make it feasible for AT&T or any other CLEC to avoid the dual data entry required by the LENS interface, or to provide service using UNE combinations. BellSouth also has not yet provided stable or complete specifications and other necessary information for its ordering and provisioning interfaces for resale. Thus, there is a significant amount of work to be completed before interfaces providing nondiscriminatory access to BellSouth's OSS can be deemed operationally ready and commercially available even for resale purposes; and BellSouth has even farther to go with respect to UNE OSS.

FCC DOCKET CC NO. 97-231
AFFIDAVIT OF JAY M. BRADBURY

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on November 24, 1997.

Jay M. Bradbury

SUBSCRIBED AND SWORN TO BEFORE ME this 24th day of November 1997.

Notary Public

My Commission Expires:

Notary Public, Cherokee County, Georgia
My Commission Expires Feb. 17, 2001

TABLE OF ATTACHMENTS

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15	Letter from A.J. Calabrese (AT&T) to Quinton Sanders (BellSouth), dated July 28, 1997
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24	BellSouth rejection notices
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27	List of Services Which Cannot be Ordered by a CLEC Using EDI
28	Excerpts from Deposition of Gloria Calhoun (August 22-23, 1997), Docket No. 960786-TL, Fla. PSC, Vol. 2 (p. 160) and Vol. 3 (pp. 214-215)
29	Letter from Terrie Hudson (BellSouth) to Pamela Nelson (AT&T), dated May 14, 1997

30	Comparison of Capability/Functionality -- Trouble Analysis and Facilitation Interface (TAFI) and Electronic Bonding Interface (EBI)
31	Electronic Communications Conformance and Intercompany Testing
32	Letter from Margaret Garvin (BellSouth) to Pamela Nelson (AT&T), dated September 15, 1997
33a	Minutes of the September 9, 1997 AT&T-BellSouth meeting (prepared by AT&T)
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34	BellSouth's List of Errors that will Stop Processing of a Service Request
35	Letter from Beverly Simmons (AT&T) to Margaret Garvin (BellSouth), dated September 24, 1997
36	"BellSouth and AT&T TCIF Issue 7 -- Concerns from 9/15 and 9/18 Meetings," dated Sept. 25, 1997 (BellSouth responses to AT&T questions)
37	Description of AT&T's Attempts to Obtain the Interfaces, Specifications and Business Rules Necessary for the Ordering of UNE Combinations
37a	Letter from James S. Hill to Robert Echols (Apr. 2, 1997)
37b	Letter from James S. Hill to Robert Echols (Apr. 10, 1997)
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38	Letter from Jill Williamson (AT&T) to Jo Sundeman (BellSouth), dated September 16, 1997

39	Memorandum from Jan Buriss (BellSouth) to Jim Carroll and Pam Nelson (AT&T), dated October 24, 1997
40	Excerpt of Testimony of William Stacy in Docket No. 97-101-C (South Carolina PSC), transcript of July 8, 1997 proceedings
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48	Late Filed Exhibit No. 10 to Deposition of William N. Stacy, filed by BellSouth on August 14, 1997 in Docket No. 960786-TL (Fla. PSC)
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50	"AT&T Monthly Surveillance Report -- Operations Support Systems (OSS) Interfaces" filed August 22, 1997
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53	Chronology of RSAG shutdown
54	Order, Ala. PSC, Docket No. 25835 (Oct. 16, 1997)
55	Order, Ga. PSC, Docket No. 7253-U (Oct. 30, 1997)
56	Order, Fla. PSC, Docket No. 960786-TL (Nov. 19, 1997)
57	Letter from Jerome Melson (ECIC Chair) to Glen Sirles (OBF Moderator), dated October 31, 1997

58	Letter from Greg Kirby (BellSouth) to Cindy Clark (AT&T), dated November 4, 1997
59	LENS Release Notes
60	BellSouth Website Notices
61	Memorandum from BellSouth to all Interexchange carriers, dated September 17, 1997
62	Letter from A.J. Calabrese (AT&T) to Mark Feidler (BellSouth), dated October 20, 1997
63	BellSouth CLEC Forum -- October 30th and 31st, 1997
64	Letter from Natasha Ervin (BellSouth) to Beverly Simmons (AT&T), dated October 29, 1997
65	Letter from Beverly Simmons (AT&T) to Melvin Porter (BellSouth), dated October 17, 1997
66	Charts Depicting BellSouth's Performance